

FILED

NOV 18 2015

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA, )  
vs. )  
Plaintiff, )  
JERRY LANE AKIN, )  
Defendant. )

) CRIMINAL NUMBER: 15-30164-DRH

INDICTMENT

**THE GRAND JURY CHARGES:**

**INTRODUCTION TO SCHEME TO DEFRAUD**

1. From in or about 2012 and continuing through March, 2014, in St. Clair County, Illinois, within the Southern District of Illinois, and elsewhere,

**JERRY LANE AKIN**

defendant herein, did cause the foreseeable use of interstate wire communications in furtherance of a scheme to defraud and to obtain money and property by means of fraudulent representations.

2. **JERRY LANE AKIN** at all times relevant to this indictment worked as an office manager for a doctor's office in Belleville, Illinois from approximately the Fall of 2009 through the Spring of 2014. As office manager he was authorized to sign checks and use a company credit card for business purposes only.

3. As part of the scheme to defraud, **JERRY LANE AKIN** would and did charge personal purchases to the company's credit card that included Cardinal baseball season tickets, concert tickets, medical bills and personal travel expenses.

4. As part of the scheme to defraud, **JERRY LANE AKIN** would and did pay personal credit card bills using the business checking account. He attempted to conceal the payments by altering the payee of the checks in the business' QuickBooks accounting software.

5. As part of the scheme to defraud, **JERRY LANE AKIN** would and did pay himself excess salary.

**COUNT 1**

**WIRE FRAUD: PAYMENT OF PERSONAL CREDIT CARD BILL**

1. Paragraphs one through five of the Introduction to Scheme to Defraud are reincorporated and realleged herein.

2. On or about January 8, 2014, in St. Clair County, Illinois, within the Southern District of Illinois, and elsewhere,

**JERRY LANE AKIN**

defendant herein, did cause the foreseeable use of interstate wire communications in furtherance of a scheme to defraud and to obtain money and property by means of fraudulent representations by fraudulently issuing a check on or about January 3, 2014 from the business account at Regions Bank in Belleville Illinois to Citi Bank, Des Moines, Iowa, causing a fraudulent transfer of funds to pay for the personal credit card of **JERRY LANE AKIN**.

All in violation of Title 18, United States Code, Section 1343.

**COUNT 2**

**WIRE FRAUD: PURCHASE OF CARDINAL BASEBALL TICKETS**

1. Paragraphs one through five of the Introduction to Scheme to Defraud are reincorporated and realleged herein.

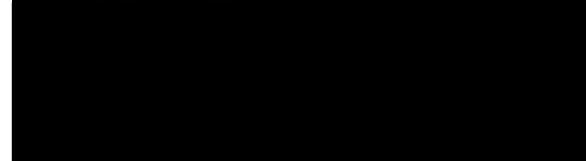
2. On or about September 27, 2013, in St. Clair County, Illinois, within the Southern District of Illinois, and elsewhere,

**JERRY LANE AKIN**

defendant herein, did cause the foreseeable use of interstate wire communications in furtherance of a scheme to defraud and to obtain money and property by means of fraudulent representations by fraudulently using the business credit card account to purchase Cardinal Baseball tickets.

All in violation of Title 18, United States Code, Section 1343.

**A TRUE BILL**



  
STEPHEN R. WIGGINTON  
United States Attorney  
Southern District of Illinois

  
NORMAN R. SMITH  
Assistant United States Attorney

Recommended bond: \$20,000 unsecured.